

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 3:19CR48
)	
Plaintiff,)	JUDGE JACK ZOUHARY
)	
v.)	
)	<u>UNOPPOSED MOTION TO EXTEND</u>
DAMON M. JOSEPH, aka)	<u>TIME FOR RESPONSE TO FILE UNDER</u>
ABDULLAH ALI YUSUF)	<u>THE CLASSIFIED INFORMATION</u>
)	<u>PROCEDURES ACT</u>
Defendant.)	

The United States of America, by and through its counsel, Michelle M. Baeppler, Assistant United States Attorney, and Alexandra Hughes, Trial Attorney, National Security Division, respectfully moves this Court to extend the time for filing motions pursuant to the Classified Information Procedures Act until June 20, 2020. On March 3, 2020, the Court entered an Order (ECF No. 37) requiring all motions under the Classified Information Act (“CIPA”) to be filed by May 20, 2020. Mitigation procedures resulting from the Coronavirus Disease 2019 pandemic has limited the prosecutors’ ability to access and review classified materials. On April 24, 2020, the defense notified the government they do not object to this request. The government therefore respectfully requests one month of additional time.

Respectfully submitted,

JUSTIN E. HERDMAN
United States Attorney

By: /s/ Michelle M. Baeppler
Michelle M. Baeppler (OH: 0065378)
Assistant United States Attorney
Federal Building
2 South Main Street, Room 208
Akron, OH 44308
(330) 761-0519
(330) 375-5492 (facsimile)
Michelle.Baeppler@usdoj.gov